

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

PRESIDENT DONALD J. TRUMP,

Plaintiff,

v.

MICHAEL D. COHEN,

Defendant.

Case No.: 23-cv-21377-DPG

PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

Plaintiff, Donald J. Trump, by and through undersigned counsel, hereby submits his Unopposed Motion for Leave to File Excess Pages, and in support thereof states as follows:

1. On May 8, 2023, Defendant Michael D. Cohen (“Defendant”) filed a Motion to Dismiss Plaintiff’s Complaint (the “Motion to Dismiss”) [D.E. 11].

2. Defendant’s 35-page Motion to Dismiss raises a host of complex factual and legal issues.

3. To sufficiently address these issues, Plaintiff requires up to 30 pages for his response in opposition to the Motion to Dismiss, which exceeds the presumptive 20-page limit under S.D. Fla. L. R. 7.1(c).

4. Through this motion, Plaintiff respectfully seeks an enlargement of the 20-page limit and seeks up to 30 pages for his response in opposition to Defendant’s Motion to Dismiss.

CERTIFICATE OF GOOD FAITH CONFERENCE PURSUANT TO LOCAL RULE 7.1

Pursuant to S.D. Fla. L. R. 7.1(a)(3), the undersigned counsel certifies that he conferred via email with Defendant’s counsel, Benjamin Brodsky, Esq., on June 3, 2023 regarding the relief

requested in this Motion, and Defendant's counsel confirmed that Defendant does not oppose the requested relief.

WHEREFORE, Plaintiff Donald J. Trump, respectfully requests that this Court enter an Order: (a) granting Plaintiff up to 30 pages to respond to Defendant's Motion to Dismiss, and (b) granting such other and further relief as this Court deems just and proper.

Dated: June 4, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 4, 2023 the foregoing was served via the Court's

CM/ECF System upon:

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By: /s/ Alejandro Brito